

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLICOTT CITY, MD 21042
410-964-0300

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311
201-342-6665

September 13, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including electronic monitoring. On September 16, 2021, Hlday is scheduled to undergo a medical procedure that requires removal of his location monitoring bracelet. Documentation regarding this testing has been provided to the government and Pretrial Services (“Pretrial”). Similar to the process that has taken place in the past, Pretrial has advised me that upon permission of the Court, Hlday can make arrangements with Pretrial in his supervising district for the removal and prompt reattachment of the device. Accordingly, defendant respectfully requests that the Court permit removal of the bracelet on September 16, 2021 as directed by Pretrial. The government, by Assistant United States Attorney Sarah Evans, and Pretrial, by United States Pretrial Officer, Jason Jacoby, consent to this application.

Thank you for Your Honor’s consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Sarah Evans (by ECF)
AUSA Mark Bini (by ECF)
USPTO Jason Jacoby (by email)